UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
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November 7, 2005

Mr. Craig Seltzer
U.S. Army Corps of Engineers
Norfolk District
803 Front Street
Norfolk, Virginia 23510

Subject: Draft Environmental Impact Statement (DEIS), Craney Island Eastward Expansion, Norfolk Harbor and Channels, Hampton Roads, Virginia.
CEQ # 20050385

Dear Mr. Seltzer:

In accordance with the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency (EPA) offers the following comments regarding the Draft Environmental Impact Statement (DEIS) for the Craney Island Eastward Expansion. The Craney Island Eastward Expansion is a proposed extension of the existing Craney Island Dredged Material Management Area (CIDMMA) and the development of a port container terminal. By expanding the CIDMMA, the project proponent's objectives are to extend the useful life of the dredged material management area as well as to build long term berthing and land side port facilities.

The DEIS describes significant environmental impacts from the Craney Island Eastward Expansion. The most notable impacts are related to the loss of 580 acres of open water to construct a new cell for the facility. These impacts are proposed to be mitigated through a conceptual mitigation plan as discussed below. Other notable environmental impacts, however, have not been as clearly defined in the document. For example, there is a lack of defined impacts due to air emissions from the port facility's installation and operation. The DEIS accurately identifies the need to address issues like non-conformity with the State Implementation Plan (SIP), but without such information, the total impacts from this proposal are uncertain. Other informational deficiencies that detract from the completeness of the document are described more fully in the attachment to this letter.

As noted above the environmental impacts that will result from the open water fill have been proposed to be mitigated through a conceptual mitigation plan in the DEIS. The conceptual mitigation plan developed for this project was based on a landscape approach. The U.S Army Corps of Engineers (USACE) has done a commendable job in developing a consensus among the resource agencies on the appropriate mitigation. We strongly suggest that this mitigation plan be monitored and the functional success be guaranteed through either an Environmental Management System (EMS) approach or adaptive management approach that would be able to modify the mitigation if not successful. This could be accomplished by incorporating such a requirement into a future Record of Decision for the project.

As suggested above, the level of detail in assessing the impacts of these two efforts is more clearly defined for the CIDMMA portion of the project. This is in part due to the long planning horizon required for the port development. As a result, EPA recommends that this portion of the document be considered as a tiered EIS in that the additional information required for the port development be evaluated in a subsequent NEPA document. This DEIS refers to just such an approach that we believe could be clarified in the executive summary and clearly described in the main body of the EIS.

Related to the preceding point, combining two possible independent components into a single project (CIDMMA expansion and port development) may be problematic. The major environmental impacts of the project appear to be caused primarily by the need for a port container facility. By combining the two distinct components into a single purpose and need formulation, the only alternative that satisfies both needs (dredge material expansion at CIDMMA and port development) is the proposed development at the expansion site. The effect of this formulation eliminates any alternative port locations not located on the current CIDMMA site. Our concern is that since the DEIS did not rigorously explore other port locations due to this narrowing of purpose and need, the DEIS may not have fully considered all other viable locations for the port container terminal location. If other alternatives exist for the development of the port container terminal, then impacts described in this DEIS would result primarily from expanding the facility solely for dredged material management, which may or may not justify the 580 acre expansion.

As discussed above and expanded upon in the technical attachment to this letter, we have rated the DEIS as EC-2 in EPA's classification system. This rating is based on the environmental impacts to aquatic resources; incomplete information concerning air toxics, particulates and wetland impacts; and environmental justice. The "EC" means that we have environmental concerns with respect to the preferred alternative (described as the recommended plan) and the "2" indicates that additional information needs to be provided in the Final Environmental Impact Statement (FEIS) to alleviate these environmental concerns. A copy of EPA's rating system is enclosed for your information.

EPA appreciates the opportunity to provide comments on the DEIS for the Craney Island Eastward Expansion project and would be pleased to discuss any of the comments and suggestions presented in this letter and attachments. Please feel free to contact Mr. William Arguto, the NEPA Team Leader and principal reviewer for this project, at 215-814-3367.

Sincerely

William J. Hoffman, Chief
Environmental Programs Branch

Enclosures

Supporting Detailed Comments

The following detailed comments and questions have been prepared by DEIS section.

Executive Summary

Please provide a discussion of interrelated permits and activities required, especially the role of the 404 process for this project. In addition it may be useful at the end of this section to describe the next steps, for instance a description of the final EIS and the selection of a preferred alternative. For example is the recommended plan, which is the language used in this document, the preferred alternative?

Table II-1 . What are the national defense criteria that were used that eliminates all of the existing Craney Island Dredged Disposal area alternatives that do not include a port expansion located on this site?

The reference to House Document 563 of the 79th Congress should be included in the Appendix. This document defines the operation of the CIDMMA and would be an important reference for understanding the operating parameters as defined by Congress.

E2.1 In the first sentence of this paragraph what is the authorizing document referred to in the sentence? Is it House Document 563, or some other document? Also this paragraph mentions that CIDMMA is authorized to handle unsuitable navigational dredged material. Does this include all types of contaminated dredged material?

E2.1 Mention is made on page ES-3 paragraph 3 that the dikes are capable of being raised to a height of 47 feet which will increase capacity of CIDMMA until 2025. However this paragraph does not state the goal and objective for the capacity of this part of the project. This is critical because it addresses purpose and need. What are the criteria for meeting the project objectives for the expansion of the CIDMMA for dredge disposal? The eastward expansion should be described in the context of how it meets this need.

The Virginia Port Authority Master Plan referenced would be useful as an appendix.

E2.2 page ES-4 The proposed Craney Island Terminal which is 580 acres is not large enough in acres to meet the VPA master plan estimate of needed acreage for port capacity. As stated it would be 300 acres short as estimated in the VPA document. However the DEIS states in this paragraph that the 580 acres would meet port facility needs well into the planning horizon? Please clarify this statement. Will additional port facility acreage be needed to meet VPA projections? Or is 580 acres more than is required.

E3.6 (East port expansion and west berm plan.) What is the purpose of the west berm strengthening? The purpose of this alternative is not fully described in this section of the detailed alternative analysis section. In addition, maps of this might be useful in understanding this alternative in comparison to the recommended plan (just an eastward expansion). It is also mentioned that after filling the new cell it would be turned over to the VPA. Does turned over

mean that VPA owns the property?

E3.8 Plan Selection. The eastern port expansion and west berm plan was not selected because it is not supported by the local sponsor but there is no explanation of why it is not supported.

E4.1.2 What is the source of the potential phosphorus load estimated in the terminal development?

E4.2.1 As stated in this section both VOC and NOx emission estimates exceed the 100 ton per year threshold. The process for developing a new SIP for the Hampton Roads area begins in 2005/2007. How will the issues of air mitigation be resolved before further planning or construction begins? Is it the intent of the USACE to submit an additional NEPA document to address these issues?

E4.2.2 / E4.2.1 Are there any impacts due to hazardous air pollutants generated because of either the CIDMM or Port Development.

E4.5 Is there an estimate of wetland impacts from the potential impacts of the rail corridor that could be quantified. This information would be useful in assessing the total impacts of the project. There is little information provided as to the impacts of the necessary infrastructure needed for the port development portion of this project.

E4.14 EPA recommends that an adaptive management approach or some form of commitment be adopted that assures the anticipated mitigation is successful in achieving the functional restoration of the environmental loss anticipated by these actions. An adaptive management approach would monitor the efforts of the mitigation and correct mitigation that does not achieve the compensation for the impacted resources.

<u>Purpose and Need</u>

1.0 Article I – Is there language that was intended to follow this heading?

1.0 Article II. What is the anticipated time required to rapid fill the new cell as described in the study authority?

1.0 Article III – Is there language that was intended to follow this heading?

1.0 Article IV page I-6. What is the planning horizon for the CIDMM? After 2025 it is anticipated that CIDMM will be filled to capacity? What is the goal or how long is it intended for this project to extend the life of CIDMM and how does this project fulfill this need?

<u>Evaluation of Alternatives</u>

1.0 For clarity purposes please identify who developed the “formulation process”. Is it a USACE process in accordance with their NEPA implementing regulations?

1.1 The decision criteria used to evaluate the alternatives does not seem to address the port project or the Military logistical and tactical deployment. Provide decision criteria used to evaluate these needs.

1.1 Page II-2 The third bullet of the economic criteria is confusing. Please provide some additional clarification of these criteria.

2.1.1 Page II-4 Please explain the plan for rapid fill. How long is it anticipated to rapid fill the new cell and how does this extend the life of CDIMM?

2.1.1 Page II-8. What are the criteria for military training uses? The DEIS states that CIDMM is routinely used for military training but does not provide criteria used to evaluate the various alternatives considered.

Table II-1 Explain that the No Action Alternative also provides a baseline. This analysis provides a benchmark, enabling decision makers to compare the magnitude of environmental effects of the action alternatives.

Table II-1 This table compares only solutions for dredging, section 2.1.2 discusses the port alternatives but does not provide the comparative table similar to Table II-1. It might be more comprehensive to add the issues discussed in Section 2.1.2 into this table.

Section 2.1.2 Page II-33. Please rephrase the second sentence, first paragraph. In lieu of the word “constructed” perhaps the word “developed” would be more appropriate.

Section 2.1.2 Page II-34. Figure II-3 referred to in the first sentence in the fourth paragraph does not provide the information as described in the sentence. This comment also applies to other references to this figure, Page II-35.

Section 2.1.2 Page II-35 Maersk Sealand property. Other paragraphs in this section have conclusions that evaluate the site as an alternative. There are no conclusions about this site provided.

Section 2.1.2 Page II-38 The second paragraph implies that only alternatives that provide for rapid fill and can build a port meet the criteria. Please explain the criteria in more detail. Can an alternative that extends the CIDMMA and provides a port in a different location be considered? Why not?

Section 3.0 Please add language describing the No Action Alternative as a baseline condition to which all the alternatives can be compared. This section continues with the negative economic effects of the No Action Alternative. This is a little misleading in that if economic benefits are the sole evaluation criteria then there could be several other alternatives besides building a port that could be considered.

Section 4.0 Page II-40. Please provide an explanation of why the western dike needs to be strengthened. A figure that differentiates this alternative from the alternative of eastern expansion without the strengthening would be helpful.

Section 5.0 Page II-41. Please provide further explanation of cost credit

Section 6.0 The second paragraph provides some excellent points. However the same concerns about selecting an alternative that has uncertainty because of a projected need in 2028 of strengthening the western dike could also be used to argue that the estimates projected in 2050 for port demand are also uncertain.

Section 6.0 page II-45. Does the recommended plan only extend the life of CIDDMA by three years after it reaches capacity in 2025? If so, it appears that this is primarily a port project and that the primary purpose is to build a port facility.

Section 7.0 Please provide additional information on rapid fill. Will the cell be filled in the course of planned dredging operations or will areas be dredged expressly to fill the cell?

Section 7.0 Page II-47. Access to the proposed terminal. There appears to be additional studies planned for the rail connections that may be dependant on the third crossing project. Please elaborate on the additional NEPA documents required. Is this considered a tiered EIS with additional EISs developed to address the unknown impacts?

<u>Affected Environment</u>

Section 1.1.8 Page III-7. The referenced Figure III-1 seems to need additional data on the maps. The figure doesn't present the data described in this section.

Section 1.2 There is no discussion of hazardous air pollutants. The existing condition of this area with respect to hazardous air pollutants would be a meaningful comparison in respect to the consequences section.

Section 1.3.2 Page III-15. The discussion of the sea turtle provides no conclusion. Are there any impacts expected?

Section 1.4.5 Page III-23. Table III-5 and the discussion uses data from 1985 – 20 years old. Is there more current data available for this discussion?

Section 1.4.7 Page III-29. In the oyster discussion please also consider identifying other factors that have caused oyster population declines such as pollution and over harvesting.

Section 1.4.7 Page III-31. The figure referenced should be Figure III – 10 vs Figure II – 10. The figure does not provide the information mentioned in the discussion. The oyster grounds are not depicted on the maps.

Section 1.7.4 Page III-36. Which port is being referred to in this section? Are these all the port facilities in this area?

Section 1.7.6 Public and Private Terminals referred to in this section are acronyms. Please provide the full names of the ports if not already described in the document. An acronym table

would be helpful in this respect.

Section 1.7.7 In the description of vessel traffic it is stated that the number of vessels has decreased but the container numbers have increased. Is this due to larger vessels? If so it might be good to add this clarification to the discussion.

Section 1.8.2 Page III-42. There is no conclusion in this section as to the capacity of the waste water facilities to be able to handle the increase of waste water.

Section 1.11.2 Page III-52. Some lead agencies also look at a 5 db change in noise from existing conditions to ascertain noticeable changes due to the impact of the project on the surrounding community. Can this be reflected in the noise analysis?

Environmental Consequences

Page IV-1 In the first paragraph, please provide more detail on how the additional information needed for port development would be used and how it will meet the NEPA requirements.

Section 1.1.2.1 Page 1.1.2.2. Please provide a description of the CWA Section 404 process requirements for this project. The 404 process requirements should also be clearly stated in the introduction to the EIS.

Section 1.1.2.2 Page IV-7. Third Paragraph. Could the VPA provide a buffer in another area as an offset?

Section 1.2 There is no discussion of the project in relation to PM2.5. Please follow the Best Practices for port emissions dated June 23, 2005, enclosed for your reference. The best practices should be used to estimate all emission sources for the port, including harbor craft.

Section 1.2.2 This project does not meet the SIP for VOC and NOX. The section states further that air quality permits may be required and goes on to discuss potential mitigation. Will mitigation be part of the permit? And how will these impacts be quantified and communicated for public review?

Section 1.2.3 This section states that the construction related emissions were not quantified. It is hard to conclude that these are not significant without some type of quantification.

Section 1.4.1.3 Page IV-32. The first paragraph in this section describes that the rip rap will provide an extremely diverse and productive community. Has this been the case for the existing dikes? Please provide the history and experience learned from the existing dike berms.

Section 1.5.2.1 The environmental consequences and the impacts to wetlands from the rail spur and road access corridors was not clear. What are the wetlands impacted, quantity in acres, and how will these impacts be mitigated? Will these issues be the subject of another NEPA document tiered off of this document?

Section 1.5.2.3. Is the statement provided in this section accurate? If the port is not developed

would there still be an eastward expansion? Or does this section mean that the channel would be dredged regardless of the port and therefore part of the No Action Alternative?

Section 1.7 It should be noted that the LOS on most of the roads is already E or F defined as extremely unstable or break down. Also provide more detail on how the trip distribution was estimated.

Section 1.11 Noise. Noise contour maps would be helpful to describe the noise effects of the two projects. Also please provide a discussion on the change on noise levels from the no action and the build out. For example, what would be the db change to the nearest affected community?

Section 1.14.1 Economics. Why are there reduced dredging costs for users of the eastward expansion? Also, in the fifth paragraph of this section please provide more clarification, who are the users of the eastward expansion?

Section 1.14.4 This section describes the economic impact of the CIDMMA in terms of costs and benefits. The section provides good detail on the estimated benefits. However the costs of the project are explained in one overall cost. Are there any indirect costs not accounted for, such as the cost of additional pollution.

Section 1.19 Coastal Zone Resources and Permits. This section would benefit from a description and the requirements of the Coastal Zone Management Act. Also it states in this section that a 404 permit will be required. Appendix H is a 404(b) (1) evaluation?

Section 1.21.2 Cumulative Effects Assessment. Page IV-72. In step 11 of the cumulative effects assessment a reference is made to adaptive management strategies and monitoring the effects of this project along with the cumulative effects. EPA strongly encourages the use of monitoring whether it be in conjunction with an EMS or adaptive management strategies under this EIS. EPA requests a commitment to monitor the success of the mitigation package to assure that it is functionally equivalent to the environmental impacts of this project

<u>Environmental Justice</u>

1. This document has taken a great deal of time and effort in its researching and assessment of the potential impacts on the ecosystem of the Elizabeth River, but spends very little time on the assessment of the human population from an Environmental Justice standpoint.

2. There has been no clear identification of the communities that could potentially be impacted by the project. Very general information is provided about the Cities of Portsmouth and Newport News, but no attempt is made to look at specific communities that could potentially be impacted by these two major projects. Characterization of those communities, summary of potential impacts upon those communities, or any indication that an in depth examination of the potential for impacts, issues or concerns related to Environmental Justice should have been assessed. There is considerable information and assessment related to blue crabs, hard clams, and other forms of aquatic life, but the key information related to Environmental Justice is missing.

3. Figures, diagrams, and other graphic representations fail to clearly show where population is located with respect to the proposed site of the project.

4. The study area around the project needs to be defined. It does not seem reasonable to characterize the entire Cites of Portsmouth and the Norfolk, Virginia Beach, Newport News MSA as though they are the study area. There must be some neighborhoods that are in close proximity to the study area. If so, they should be evaluated for environmental justice concerns.

5. The assessment of non-white population presented in the document seems flawed. It is not reasonable to assume that there are no potential Environmental Justice concerns because the non-white in the study area does not exceed the non-white population of either the City of Portsmouth or the Norfolk, Virginia Beach, Newport News MSA. Please note that the non-white percentages noted in the Tract Data exceeds the state average.

6. Please provide information on the low-income population in the area of impact. Information is provided for the City of Portsmouth, the Norfolk, Virginia Beach, Newport News MSA, and the State of Virginia. What about the area of concern? It seems that there should be concern due to the large numbers of persons living in poverty in the areas mentioned above. It seems reasonable that there will be significant numbers of persons living below the poverty level in the area near the project.

7. What are the plans for conducting meaningful outreach and community involvement for this project? How will you assure the meaningful participation of the at-risk population? Remember environmental justice also entails meaningful community involvement and access to information. What is being done to address these issues?

8. What strategies will be employed to assure the mitigation of potential cumulative or multiple impacts upon the at-risk community?

9. It seems difficult to conduct a proper Environmental Justice assessment when the potential communities of concern have not been clearly defined. For this reason, the Environmental Justice assessment appears to be inadequate.

General Comments

The following two voluntary programs have been successful in reducing pollution and its impacts for stormwater and diesel engine idling. Please consider implementing these initiatives for this project.

Low Impact Development

Please consider using Best Management Practices related to stormwater controls throughout the development of this project as described below.

A Presidential Memorandum (dated April 26, 1994) and Guidance (dated August 10,

1995) applicable to Federal facilities and federally funded projects pertinent to environmentally and economically beneficial landscape practices is to be incorporated into all NEPA-related documents. As outlined in Executive Order 13148 dated April 26, 2000 (Federal Register Vol. 65, No. 81) on Greening the Government, it has been directed that all agencies incorporate the above Guidance into landscape programs, policies and practices. The Guidance calls for agencies that fund any landscape to provide recipients with information of beneficial landscaping as well as to work to support and encourage application of the principles. The EPA, GSA, and USDA are tasked with providing technical information on beneficial landscaping to other federal agencies and their facilities. This effort, also recognized as low impact development, has the potential to reduce impacts on watershed hydrology and aquatic resources as described below.

Low impact development, or LID, is a natural approach to land development and stormwater management designed to reduce impacts on watershed hydrology and aquatic resources. It is important to incorporate LID efforts to mitigate the effects of development through traditional stormwater management practices which have proven to not be entirely successful. Traditional collection and conveyance systems, stormwater ponds and other stormwater facilities do not replicate natural systems, which greatly slow water before it reaches streams, wetlands and other waters. Development often times results in the loss of trees and other vegetation, the compaction of soils by heavy equipment, and the creation of vast stretches of connected impervious areas. These combined factors are extremely difficult to compensate for using traditional practices. Prior to the development of any structural stormwater practices on a site, significant reductions in stormwater quantity and quality impacts can be made through enhancements to site design. As a result, the following site design goals and planning practices can be used to minimize stormwater impacts:

* Design Goal: Minimize direct stormwater impacts to streams and wetlands to the maximum extent practicable. Practices: 1. Locate stormwater facilities outside of streams and wetlands; 2. maintain natural drainage routes on site; 3. preserve riparian buffers; and 4. distribute “Integrated Management Practices (IMPs)” used in lieu of centralized ponds.

* Design Goal: Preserve the natural cover on as much of the site as possible, especially for areas located on hydrologic soil groups (HSG) A and B. Practices: 1. Utilize clustered development designs that preserve a significant portion of the site in a natural state; 2. utilize “fingerprint” clearing by limiting the clearing and grading of forests and native vegetation to the minimum area needed for the construction of the lots, the provision of necessary access, and fire protection; 3. avoid impacts to wetlands or vegetated riparian buffers; and 4. Preserve A & B soils in natural cover.

* Design Goal: Minimize the overall impervious cover. Practice: 1. Utilize the minimum required width for streets and roads; 2. utilize street layouts that reduce the number of homes per unit length; 3. minimize cul-de-sac diameters, use doughnut cul-de-sacs, or use alternative turnarounds; 4. minimize excess parking space construction, utilize pervious pavers in low-use parking areas; 5. utilize structured or shared parking; 6. reduce home setbacks and frontages; 7. where permitted, minimize sidewalk construction by utilizing sidewalks on one side only, utilizing “skinny” sidewalks, or substituting sidewalks with pervious trails through common greenspace; 8. substitute pervious surfaces for impervious wherever possible; 9. where permitted, avoid the use of curb and gutter and utilize vegetated open swales, preferably

“engineered swales” with a permeable soil base; and 10. minimize compaction of the landscape and in areas where soils will become compacted due to construction equipment, specify that the soils will be “disked” prior to seeding, and amended with loam or sand to increase absorption capacity.

* Design Goal: Locate infiltration practices on HSG A and B soils wherever possible. Thus, every effort should be made to utilize areas with these soils for IMPs that promote infiltration.

* Design Goal: Locate impervious areas on less permeable soils (HSG C and D). Placement of impervious areas on lower permeability soils minimizes the potential loss of infiltration/recharge capacity on the site.

* Design Goal: “Disconnect” impervious areas. “Disconnecting” means having impervious cover drain to pervious cover, i.e. downspouts draining to the yard, not the driveway. This decreases both the runoff volume and time of concentration.

* Design Goal: Increase the travel time of water off of the site (time of concentration). Practices: 1. Flatten grades for stormwater conveyance to the minimum sufficient to allow positive drainage; 2. increase the travel time in vegetated swales by using more circuitous flow routes, rougher vegetation in swales, and check dams; and 3. utilize “engineered” swales in lieu of pipes or hardened channels.

* Design Goal: Utilize soil management/enhancement techniques to increase soil absorption. Practices: 1. Delineate soils on site for the preservation of infiltration capacity; and 2. require compacted soils in areas receiving sheetflow runoff (such as yard, downslope of downspouts).

* Design Goal: Revegetate all cleared and graded areas with native and noninvasive species.

* Design Goal: Utilize level spreading of flow into natural open space.

For additional LID information, please refer to the following web sites.

- LID Manuals:
  http://www.epa.gov/owow/nps/lid_hydr.pdf
  http://www.epa.gov/owow/nps/lidnatl/pdt
- http://www.bmpdatabas.org
- http://www.txnpsbook.org/
- http://www.epa.gov/ednnrmrl/

SmartWay Transport - diesel engine idling BMPs

Please consider incorporating any SmartWay initiatives that can be integrated into this project or general facility operating procedures, especially some of the idling best management practices. This effort has the potential to reduce pollution emissions as noted in the brief smart way description provided below.

SmartWay Transport is a voluntary partnership between various freight industry sectors and EPA that establishes incentives for fuel efficiency improvements and greenhouse gas emissions reductions. By 2012, this initiative aims to reduce between 33-66 million metric tons of carbon dioxide (CO2) emissions and up to 200,000 tons of nitrogen oxide (Nox) emissions per year. At the same time, the initiative will result in fuel savings of up to 150 million barrels of oil annually. There are three primary components of the project: creating partnerships, reducing all unnecessary engine idling, and increasing the efficiency and use of rail and intermodal operations.

One component of the SmartWay Transport Partnership is to eliminate unnecessary truck and rail idling by developing a nationwide network of idle-reduction options along major transportation corridors - truck stops, travel centers, distribution hubs, rail switch yards, borders, ports, and even along the side of the road. The Environmental Protection Agency is working with the trucking industry, manufacturers of idle control technologies, various states, and other partners to help save fuel and reduce air pollution from idling trucks. EPA is conducting emissions testing on idling trucks under various conditions, surveying trucking fleets to learn more about idling times, implementing demonstration projects to test idle control technologies, and holding workshops to educate affected communities. The vast majority of fuel consumed during long-duration idling can be saved and air emissions reduced by installing one of several idle control technologies that provide heat, air conditioning, and electrical power. These technologies include auxiliary units and truck stop electrification. The technologies to address engine idling are evolving, and EPA plans to test new technologies as they come to the market. You can find a list of the currently available idle technologies at http://www.epa.gov/otaq/retrofit/idlingtech.htm.

It would be useful to include a list of acronyms. There were several areas were acronyms were used and not defined.